

Executive Session

Today's Item	Information <input type="checkbox"/>	Action <input checked="" type="checkbox"/>
Executive session includes four standing topics:		
(A) Pending litigation to which the Commission is a party		
(B) Possible litigation involving the Commission		
(C) Staffing		
(D) Deliberation and action on license and permit items		

Summary of Previous/Future Actions (N/A)

Background

During the public portion of its meeting, the Commission will call a recess and reconvene in a closed session pursuant to the authority of California Government Code Section 11126, subdivisions (a), (c)(3) and (e)(1). The Commission will address four items in closed session: Pending litigation, possible litigation, staffing, and license and permit items.

(A) **Pending Litigation to Which the Commission is a Party**

See agenda for a complete list of pending civil litigation to which the Commission is a party, at the time the agenda was made public. At any meeting, during executive session, the Commission may take action related to pending litigation.

(B) **Possible Litigation Involving the Commission**

(C) **Staffing**

For details about staffing, see the executive director's report under Agenda Item 11(A) for today's meeting.

(D) **Deliberation and Action on License and Permit Items**

- I. Consider the proposed decision in Agency Case Number 24ALJ45-FGC regarding suspension of commercial passenger fishing vessel licenses issued to the fishing vessels *Caroline*, *Checkmate*, and *Star of Monterey*, and suspension of Chris' Fishing Trips Inc.'s and Christopher Arcoleo's privileges to hold a commercial boat registration and/or commercial passenger fishing vessel license.

The Department filed an accusation with the Commission on December 17, 2024 and served the accusation on Chris' Fishing Trips Inc. and Christopher Arcoleo (Respondents); the accusation asks that the Commission suspend the commercial boat registrations and commercial passenger fishing vessel licenses at issue for two years and suspend the two respondents' privileges to hold such licenses for two years.

Staff Summary for February 11-12, 2026

Staff referred the case to the California Office of Administrative Hearings (OAH) and OAH conducted a hearing. After the hearing, OAH submitted a proposed decision (Exhibit 1) to the Commission. The proposed decision finds that the twenty-nine causes the Department presented all presented adequate basis for discipline and recommends a six-month suspension.

Commission staff received an email from counsel for Respondents indicating that Respondents do not oppose the proposed decision.

Significant Public Comments (N/A)

Recommendation

Commission staff: Hear argument from any of the parties that wish to address the Commission in open session and then deliberate in closed session on item D.1.

Exhibits

1. [Proposed decision, dated January 9, 2026](#)

Motion

Options will be discussed during closed session regarding Agency Case Number 24ALJ45-FGC.

**BEFORE THE
FISH AND GAME COMMISSION
DEPARTMENT OF FISH AND WILDLIFE
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**CHRIS' FISHING TRIPS, INC. and CHRISTOPHER ARCOLEO,
Respondents.**

Agency Case No. 24ALJ45-FGC

OAH No. 2025050041

PROPOSED DECISION

Administrative Law Judge Karen Reichmann, State of California, Office of Administrative Hearings, heard this matter on December 15 and 16, 2025, by videoconference.

Staff Attorney Steffanie Mello represented complainant Nathaniel Arnold, Chief of the Law Enforcement Division, Department of Fish and Wildlife.

Attorney Seth Weinstein represented respondents Chris' Fishing Trips, Inc., and Christopher Arcoleo. Arcoleo was present throughout the hearing.

The record closed and the matter was submitted for decision on December 16, 2025.

FACTUAL FINDINGS

1. Respondent Christopher Arcoleo is the owner of respondent Chris' Fishing Trips, Inc. (CFT). At all times relevant to the allegations in the accusation, the Department of Fish and Wildlife (Department) issued Commercial Boat Registrations and Commercial Passenger Fishing Vessel licenses to CFT for three fishing vessels: the *Checkmate* (Boat Registration Number FG40856), the *Caroline* (Boat Registration Number FG40054), and the *Star of Monterey* (Boat Registration Number FG32191). CFT operates passenger fishing trips from the wharf in Monterey.

2. On December 17, 2024, complainant Nathaniel Arnold issued an accusation, in his official capacity as the Department's Chief of the Law Enforcement Division, seeking to suspend respondents' licenses for two calendar years, based on multiple violations of the Fish and Game Code and its implementing regulations. Respondents filed notices of defense.

Incidents, Investigations, and Convictions

SEPTEMBER 3, 2023, INCIDENT

3. On September 3, 2023, Department Lieutenant Scott Kennedy posed as a paying passenger and went undercover on a fishing trip on the *Checkmate*. There were 22 passengers. CFT employees Troy Stokes and Joshua Abbey were the operator (captain) and deckhand, respectively.

4. The passengers were fishing for rockfish. There is a limit of 10 rockfish per passenger. Kennedy observed passengers catching fish, retaining larger fish, and returning smaller fish to the water. At some point Stokes told the passengers to discard any unwanted fish into a bucket he provided, rather than tossing them back.

Towards the end of the trip, Kennedy observed Stokes fishing, but did not observe him retain any fish. Kennedy never observed Abbey fishing. A station was set up for filleting fish for the passengers. Passengers were told that they could take fish from the discard bucket if they had not met their limit of 10 rockfish per angler. As the vessel approached the wharf, Department officers were visible on the dock. Stokes summoned Abbey, who returned with a bucket labelled "crew fish." Abbey took fish from the bucket of discarded passenger fish and placed them in the "crew fish" bucket.

5. Department personnel, including Warden Herbert LeBlanc, met the vessel as it arrived and conducted an inspection. There were 17 rockfish in the "crew fish" bucket. LeBlanc reviewed the vessel's fishing activity log, which stated that the two crew members had fished and retained 20 fish.

6. Based on Kennedy's report that only Stokes had fished, and that neither Stokes nor Abbey had caught any fish, citations were issued to both Stokes and Abbey. The 17 fish that were placed in the crew fish bucket but were actually caught by passengers exceeded the passenger boat limit. The log was inaccurate because the crew caught no fish, not 20 as was documented.

JUNE 10, 2023, INCIDENT

7. On June 10, 2023, Warden Kevin DeRose observed the *Checkmate* returning to port. He boarded the *Checkmate* for a compliance check. Stokes was the captain and a deckhand was fileting fish. DeRose observed on his computer that the *Checkmate* was just creating an electronic fishing activity log for the trip as he was approaching. These logs must be created and certain portions filled out prior to the vessel leaving the dock at the beginning of the trip. Stokes admitted that he "forgot" to create the log until he saw the patrol boat approaching. DeRose issued citations to

Stokes and Arcoleo (as the owner of CFT), for not creating and documenting pertinent information in a fishing log prior to sailing, and referred the matter to the district attorney. It was not established whether DeRose provided the citation to Arcoleo.

FEBRUARY 2023, INCIDENTS

8. Warden Ryan Meier was patrolling Monterey Bay on February 1, 2023. While on patrol, he observed an orange buoy within the Portuguese Ledge, a state marine conservation area. Fishing for crustaceans is prohibited in this area. Meier documented the location of the buoy and confirmed it was within the Portuguese Ledge. The buoy was pulled from the water along with its attached trap line and Dungeness crab trap. Meier observed that the name "Checkmate" and the registration number for the *Checkmate* were written on the buoy. The trap had bait in it and was closed, ready to catch crabs. The trap did not have an unobstructed five-inch opening when the destruct device fails, as required in the event the trap fails and cannot be retrieved. Meier seized the trap.

9. Meier was patrolling Monterey Bay again on February 2, 2023. He observed the *Checkmate*, approached it, and went onboard. He was greeted by two employees, Stokes and "Reed." Stokes told Meier that the vessel's captain was below deck. This was false; Stokes was the captain.

Meier asked Stokes for the location of the vessel's crab traps. Stokes provided a plotter with 17 traps identified. Meier took a photo which he sent to another Department patrol boat. Crew on the other patrol boat located the traps and pulled them. Ten of these traps had one or more violations, for a total of 12 violations: 5 traps did not have trap tags; 6 traps did not have a five-inch unobstructed opening when

the destruct device fails; and the surface buoy for one trap was not marked with the commercial boat registration number. These traps were seized.

10. On February 3, 2023, Meier called CFT and spoke with Arcoleo. Meier notified Arcoleo that 11 traps had been seized. Arcoleo confirmed that Stokes had in fact been the captain of the *Checkmate* on the prior day. Stokes later called Meier and admitted he had been the captain.

11. On February 10, 2023, Meier spoke with Stokes at CFT's storefront on the Monterey Wharf and explained the violations that had been identified with the 11 crab traps. Meier issued a citation to Stokes for fishing with crabs traps without 5-inch openings, not having markings as required, missing trap tags, and for fishing in the Portuguese Ledge marine conservation area.

SEPTEMBER 17, 2023, INCIDENT AND RELATED CONVICTION

12. On September 17, 2023, Warden James Rees was completing his field training. He was on a patrol boat that stopped the *Caroline* for a compliance check. One passenger aboard the vessel, Israel Hermosillo, had a fishing rod and had caught a fish. He did not have a valid fishing license for that day with him. Graydon John Klusmire was the captain of the *Caroline*. He told Rees that his deckhand was responsible for verifying passengers' fishing licenses. Rees observed Klusmire apparently trying to alter the vessel's electronic fishing activity log and told him to stop. Rees issued citations to Hermosillo and Klusmire. He then wrote a report and forwarded it to the district attorney.

13. On January 3, 2024, as a result of this incident, Klusmire was convicted in Monterey County Superior Court, pursuant to a no contest plea, of a misdemeanor

violation of Fish and Game Code section 7147 (permitting a person to fish without a license).

OCTOBER 1, 2022, INCIDENT

14. On October 1, 2022, Warden Douglas Wall was working in the Monterey Harbor. He observed the *Caroline* in the harbor and individuals walking down the ramp carrying plastic bags. He contacted one individual and observed filets of fish in the bag, mostly without skin. The individual had been a passenger on the *Caroline* for a fishing derby for veterans. He told Wall that the crew had fileted the fish and removed the skin for the passengers. Two of this passenger's fish had skin remaining because the passenger had requested that it be left on so that he could smoke the fish.

15. Wall contacted the crew of the *Caroline* later that day at the Monterey Wharf. Klusmire had been the captain and Roy Smith the deckhand during that day's fishing trip. Klusmire denied knowledge of the fileting and removal of skin, and stated that the species of fish caught had been recorded in the vessel's log prior to any fileting. Smith admitted that he had removed the skin to make it easier for the veterans. Wall issued citations to Klusmire and Smith. Wall explained at hearing that skin must be left on fish so that the species can be identified, because there are prohibitions and limits on taking certain species.

FEBRUARY/MARCH 2019, INCIDENT

16. On February 23, 2019, DeRose and other wardens were inspecting crab traps for compliance. They found buoys that appeared to be from the *Caroline*. The boat registration numbers were not legible, but they could barely make out the faded word "Caroline" on the buoys. The tags within the attached traps had tags identifying

them as belonging to the *Caroline*. The wardens located the *Caroline* nearby and made contact with the crew. Klusmire was the captain and Stokes was the deckhand. DeRose told them that he had seen buoys that did not have registration numbers visible and gave them a verbal warning.

17. On March 16, 2019, DeRose and another warden were again checking crab traps for compliance. They found three buoys belonging to the *Caroline* that were missing boat registration numbers and/or had illegible markings. The wardens located the *Caroline* and spoke to Klusmire and Stokes who said they were swapping out the buoys as they were servicing the traps, but the wardens had seen them servicing traps without doing anything to the buoys. Another Department vessel located two other buoys belonging to the *Caroline* that were also in violation. DeRose boarded the *Caroline* when it docked and spoke to Klusmire and Stokes again. Klusmire said it was difficult to re-mark the buoys while servicing the traps and that he did not intend to break the law. DeRose testified at hearing that it is not difficult to re-mark the buoys while servicing crab traps.

OCTOBER 28, 2018, INCIDENT AND RELATED CONVICTION

18. On October 28, 2018, DeRose was working as a marine officer performing inspections. He saw the *Caroline* return to its slip and some passengers disembark. DeRose went to talk to the captain, which was again Klusmire. DeRose observed some passengers still onboard waiting for the deckhand to filet their fish. He spotted a large ling cod. Klusmire was filling out a paper fishing activity log of the trip (paper logs were used prior to CFT changing to electronic logs). At the time DeRose contacted Klusmire, only the date and the number of passengers had been filled out in the log, and not the number or species of fish caught. These entries needed to be completed

prior to any passengers disembarking. Klusmire told DeRose he usually fills out the log book as he is supposed to, but that he was having "an off day."

19. DeRose talked to the deckhand, who told him the crew had caught their limit, 20 fish, and pointed to a bucket. DeRose counted 20 fish in the bucket, but the bucket was not labeled "crew fish" as required. DeRose saw additional fish on the ground near the bucket, and the deckhand told him they were just "carcasses." DeRose counted five whole rockfish in the pile of alleged carcasses.

20. As a result of this incident, on April 12, 2019, Klusmire was convicted, pursuant to a plea of no contest, of misdemeanor violations of California Code of Regulations, title 14, section 195, subdivision (a) (failure to keep complete and accurate record of fishing activities) and subdivision (f)(1) (failure to fish within limits).

MAY 1, 2014, INCIDENT

21. On May 1, 2014, DeRose was patrolling near Big Sur. It was the opening day of rockfish season. DeRose spotted the *Star of Monterey* fishing deeper than allowed. As DeRose's boat approached the *Star of Monterey*, he saw passengers pulling in their lines and the boat preparing to leave the area. DeRose boarded the boat and talked to the captain, George Lemon, who admitted that they had been fishing at a depth of 280 feet and that he was aware that the depth limit was 240 feet. DeRose issued citations to Lemon and the two crew members, David Smith and David O'Brien, for fishing for rockfish in water deeper than 240 feet, in violation of California Code of Regulations, title 14, section 27.40, subdivision (b)(2).

Respondent's Evidence

22. CFT was founded by Arcoleo's father in 1948. Prior to the founding of CFT, Arcoleo's grandfather, a Sicilian immigrant, operated fishing trips in Monterey Bay beginning in the 1920s. Arcoleo grew up around the boats, became a captain, worked for his father, and then took over CFT when his father died in 1970. Arcoleo's mother worked for the business until around 1990. In addition to operating one to two fishing trips each day, CFT provides whale watching trips and burials at sea. Fishing trips represent approximately 40 percent of CFT's revenue. CFT operates a small retail shop on the Monterey Wharf where Arcoleo's son and grandson work. Arcoleo's wife of 63 years is the bookkeeper for CFT.

23. Arcoleo is 84 years old and is active in operating CFT. He is at the business on the wharf every day and is well known throughout the community. Arcoleo has not personally taken passengers on a fishing trip since 1980.

24. Keith Stemmler has been working for CFT since 2011, first as a videographer and social media developer. He took over as CFT's manager in 2021, after Arcoleo's daughter left this role due to illness.

25. Several employees involved in the violations are no longer working for CFT. Stokes was terminated on November 1, 2024. Lemon (2014 incident) retired two years ago from sailing and now comes to CFT on occasion only to fix equipment. Arcoleo reported that Lemon received only this one citation during his 60 years as a captain. O'Brien (2014 incident) and Smith (2022 incident) also no longer work for CFT. Klusmire is still working for CFT. He is in his 70s and worked for a competing business for many years before joining CFT about five years ago. Arcoleo is confident in his current employees. He talks to them often and tells them to follow the law and to

make sure the logs are done correctly. He noted that there have been no issues since Stokes left.

26. After the February 2023 incidents involving crab traps, CFT stopped all crab fishing. CFT purchased the crab traps not realizing that they were illegal because the openings were smaller than five inches.

27. CFT's policy is to check fishing licenses in the store before passengers board the vessels and then check them again onboard.

28. Arcoleo and Stemmler were aware of some of the violations, but had not been informed about all of them. Employees are supposed to notify CFT about violations but did not always do so. CFT was not directly notified by the Department about the violations at the time the citations were issued. Arcoleo and Stemmler were very surprised to receive the accusation. They do not dispute the violations occurred. Arcoleo understands that he is responsible as the owner for the violations committed by his employees.

29. After receiving the accusation, Stemmler realized that CFT had to take action to prevent further violations. CFT hired Captain David Bacon to develop a "Standard Operating Procedures Manual." Bacon has operated a commercial passenger fishing vessel for more than 30 years. He also works as a consultant. He has never been cited by the Department.

Bacon developed the manual with three goals: safety, compliance, and customer satisfaction. He reviewed the accusation and the underlying investigation reports before drafting the manual. He believes that adherence to the manual will protect fisheries and the public.

All CFT employees involved in fishing trips must review the manual and sign an acknowledgement form. The manual directives include complying with the Department's regulations, checking passengers' fishing licenses, accurately logging fishing activities, using only legal fishing gear, and adhering to environmental guidelines. Failure to comply with the manual will result in discipline or termination of CFT employees.

30. Arcoleo and Stemmler stated that a two-year suspension would harm their 12 employees, many of whom have no other skills and are uneducated. Arcoleo and Stemmler are proud of paying their employees well and noted that these employees have been able to support their families and buy homes.

31. Edwin Smith, a retired police officer and current member of the Monterey City Council, testified on behalf of respondents. Smith has known Arcoleo for many years, beginning when Smith was working as a police officer in Monterey. Smith visits the Monterey Wharf almost every day. Smith testified that CFT has a great reputation in the community for providing whale watching and fishing trips. As a city councilmember, Smith is aware that CFT has been a reliable tenant of the municipal wharf, paying bills on time. Smith was surprised to learn about the accusation because he knows that Arcoleo expects his employees to perform to a higher standard and tries to run his business correctly.

32. Dominic Mercurio has operated a café and a restaurant close to CFT on the Monterey Wharf, starting in 1981. He reported that CFT and Arcoleo both have a great reputation and are well-known and well-liked, with many longtime, repeat customers. Mercurio was surprised to learn about the accusation. He believes that if CFT is suspended from operating, it would be devastating to the entire Monterey Wharf.

33. In October 2025, Arcoleo was honored by the mayors of Seaside and Sand City, and by United States Congress Member Jimmy Panetta, in connection with the 180th anniversary of the Monterey Wharf where CFT has operated for almost 80 years.

LEGAL CONCLUSIONS

1. The burden of proof in an administrative hearing is on the party bringing the charges. (*Hughes v. Bd. of Architectural Exam'rs* (1998) 17 Cal.4th 763, 789, fn. 9.) Because no law requires otherwise, the standard is proof by a preponderance of the evidence. (Evid. Code, § 115; *Imports Performance v. Department of Consumer Affairs, Bureau of Automotive Repair* (2011) 201 Cal.App.4th 911, 916–918.)

2. Fish and Game Code section 7857, subdivision (b), provides that the Commission may suspend or revoke commercial fishing privileges for any "violation of this code, the terms of the permit or other entitlement, or the regulations adopted pursuant thereto, by the licensee, permittee, person holding the entitlement, or their agent, servant, employee, or person acting under the licensee's, permittee's, or entitled person's direction or control."

Causes for Discipline

FIRST CAUSE FOR DISCIPLINE: WITHDRAWN

3. Complainant withdrew the first cause for discipline at the conclusion of the hearing.

SECOND AND THIRD CAUSES FOR DISCIPLINE: SEPTEMBER 3, 2023

4. Cause for discipline for exceeding the passenger boat limit by 17 fish on September 3, 2023, (by placing discarded passenger fish into the crew fish bucket), in violation of California Code of Regulations, title 14, section 195, subdivision (e)¹, was established, in light of the matters set forth Finding 6.

5. Cause for discipline for false and inaccurate statements in a fishing log on September 3, 2023 (for falsely documenting that the crew had caught 20 fish when the crew caught no fish) in violation of Fish and Game Code section 1054, subdivision (a), and California Code of Regulations, title 14, sections 190, subdivision (a), and 195, subdivision (c), was established, in light of the matters set forth in Finding 6.

FOURTH AND FIFTH CAUSES FOR DISCIPLINE: JUNE 10, 2023

6. Cause for discipline based on Stokes, as the operator of the *Checkmate*, failing to document the number of passengers fishing prior to departure on June 10, 2023, in violation of California Code of Regulations, title 14, section 195, subdivision (e)(5), was established in light of the matters set forth in Finding 7.

7. As set forth in Finding 7, a citation was issued to Arcoleo as the owner of CFT, based on Stokes's failure to document the number of passengers fishing prior to departure on June 10, 2023, in violation of California Code of Regulations, title 14, section 195, subdivision (e)(5).

¹ All references to the California Code of Regulations are to the versions in effect at the time of the violations.

**SIXTH CAUSE FOR DISCIPLINE: FEBRUARY 10, 2023, CITATION FOR FISHING
IN THE PORTUGUESE LEDGE ON FEBRUARY 1, 2023**

8. California Code of Regulations, title 14, section 632, subdivision (a)(1)(C), provides that it is unlawful to engage in commercial fishing activities in state marine conservation areas. Cause for discipline was established, based on the presence of a baited crab trap within the Portuguese Ledge state marine conservation area on February 1, 2023, which resulted in the issuance of a citation to Stokes, captain of the *Checkmate*. (Findings 8 and 11.)

SEVENTH THROUGH NINETEENTH CAUSES FOR DISCIPLINE: FEBRUARY 1-2, 2023 (CRAB TRAP VIOLATIONS)

9. Cause for discipline for violating requirements for crab traps set forth in California Code of Regulations, title 14, section 29.80, subdivision (c), was established, based on the 13 violations discovered on February 1 and 2, 2023 involving 11 crab traps deployed by Stokes, captain of the *Checkmate*. (Findings 8, 9, & 11.)

TWENTIETH CAUSE FOR DISCIPLINE: SEPTEMBER 17, 2023

10. Cause for discipline based on Klusmire, as captain of the *Caroline*, permitting a passenger to fish without a valid sport fishing license on September 17, 2023, in violation of Fish and Game Code section 7147, was established in light of the matters set forth in Findings 12 and 13.

TWENTY-FIRST CAUSE FOR DISCIPLINE: OCTOBER 1, 2022

11. Cause for discipline based on the captain and deckhand of the *Caroline* allowing, on October 1, 2022, fish to be brought ashore without skin to enable species

identification, in violation of Fish and Game Code section 5509 and California Code of Regulations, title 14, sections 27.60, subdivision (c)(3), and 27.65, was established, in light of the matters set forth in Findings 14 and 15.

TWENTY-SECOND THROUGH TWENTY-SIXTH CAUSES FOR DISCIPLINE:
MARCH 16, 2019

12. Cause for discipline based on the crew of the *Checkmate* fishing on March 16, 2019, with five crab traps without commercial boat registration numbers and/or legible markings affixed to each buoy, in violation of California Code of Regulations, title 14, section 29.85, subdivision (a)(5), was established in light of the matters set forth in Finding 17.

TWENTY-SEVENTH THROUGH TWENTY-NINTH CAUSES FOR DISCIPLINE:
OCTOBER 28, 2018

13. Cause for discipline based on Klusmire, captain of the *Caroline*, failing to document the species and number of fish passengers caught in a fishing activity log prior to passengers disembarking on October 28, 2018, in violation of California Code of Regulations, title 14, sections 190, subdivisions (a) and (c)(1), and 195, subdivision (a), resulting in Klusmire's conviction in April 2019, was established in light of the matters set forth in Findings 18 and 20.

14. Cause for discipline based on the crew of the *Caroline*, on October 28, 2018, failing to separate fish taken by crew members and label the fish appropriately, in violation of California Code of Regulations, title 14, section 195, subdivision (e), was established in light of the matters set forth in Finding 19.

15. Cause for discipline based on the crew of the *Caroline*, on October 28, 2018, exceeding the passenger fish limit, in violation of California Code of Regulations, title 14, section 195, subdivisions (e) and (f)(1), resulting in Klusmire's conviction in April 2019, was established in light of the matters set forth in Findings 19 and 20.

THIRTIETH CAUSE FOR DISCIPLINE: MAY 1, 2014

16. Cause for discipline based on the crew of the *Star of Monterey*, on May 1, 2014, taking passengers fishing for rockfish in water deeper than 240 feet, in violation of California Code of Regulations, title 14, section 27.40, subdivision (b)(2), was established, in light of the matters set forth in Finding 21.

Determination of Discipline

17. Cause for discipline having been established, the issue is the appropriate level of discipline to impose on respondents. The Commission may suspend or revoke a license for violations of the Fish and Game Code or its corresponding regulations, or any other provision of law that is intended to protect fish and wildlife of the State of California. (Cal. Code Regs., tit. 14, § 745.5, subd. (a).)

18. Complainant seeks a two-year suspension, arguing that the discipline must be severe enough to deter future violations and protect the state's fisheries. Respondent argued that a 15-day suspension is sufficient discipline, noting that respondents were not directly involved in the misconduct, were not directly notified by the Department when the violations occurred, and have taken corrective action in response to the accusation.

19. The violations span almost 10 years and involved serious threats of harm to the state's fisheries. Respondents did not dispute the violations. The evidence

established that CFT's employees were expected to follow all laws, failed to do so, and often failed to notify CFT when cited. The violations reflect a lack of oversight and not a willful intent by respondents to violate the law. Respondents acknowledge the seriousness of the violations and have increased their oversight of their employees, including by adopting a Standard Operating Procedures Manual, to prevent further violations. Respondents expressed their commitment to operating lawfully.

20. In light of respondents' significant rehabilitation and acceptance of responsibility, a two-year suspension is unwarranted and would be unduly punitive. A six-month suspension is adequate discipline and should serve as a deterrence to respondents and other licensees.

ORDER

1. The commercial boat registrations and commercial passenger fishing vessel licenses issued to the fishing vessels *Caroline*, *Checkmate*, and *Star of Monterey* are suspended for six months.
2. Respondent Chris' Fishing Trips Inc.'s and respondent Christopher Arcoleo's privileges to hold a commercial boat registration and/or commercial passenger fishing vessel license are suspended for six months.

DATE: 01/09/2026

Karen Reichmann

KAREN REICHMANN

Administrative Law Judge

Office of Administrative Hearings